REMARKS

Claims 1-22 are pending in the application.

Claims 1-22 have been rejected.

Claims 8 and 9 have been amended as set forth herein.

Claims 1-22 remain pending in this application.

Reconsideration of the claims is respectfully requested. The Applicants make the aforementioned amendments and subsequent arguments to place this application in condition for allowance. Alternatively, the Applicants make these amendments and offer these arguments to properly frame the issues for appeal. In this Response, the Applicants make no admission concerning any now moot rejection or objection, and affirmatively deny any position, statement or averment of the Examiner that was not specifically addressed herein.

CLAIM REJECTIONS -- 35 U.S.C. § 103

Claims 1, 3, 5-14, 16 and 18-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,665,297 to *Hariguchi, et al.* ("*Hariguchi*") in view of U.S. Patent No. 6,067,547 to *Douceur* ("*Douceur*") and further in view of U.S. Patent No. 7,194,740 to *Frank et al.* ("*Frank*"). Claims 2 and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hariguchi in view of Douceur and further in view of U.S. Patent No. 5,784,699 to *McMahon, et al.* ("*McMahon*"). Claims 4 and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hariguchi* in view of U.S. Patent Publication No. 2001/0027479 to *Delaney, et al.* ("*Delaney*") and

further in view of U.S. Patent No. 6,625,612 to *Tal, et al.* ("*Tal*"). The Applicants respectfully traverse the rejection.

In *ex parte* examination of patent applications, the Patent Office bears the burden of establishing a *prima facie* case of obviousness. MPEP § 2142; *In re Fritch*, 972 F.2d 1260, 1262, 23 U.S.P.Q.2d 1780, 1783 (Fed. Cir. 1992). The initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention is always upon the Patent Office. MPEP § 2142; *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re Piasecki*, 745 F.2d 1468, 1472, 223 U.S.P.Q. 785, 788 (Fed. Cir. 1984). Only when a *prima facie* case of obviousness is established does the burden shift to the applicants to produce evidence of nonobviousness. MPEP § 2142; *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re Rijckaert*, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). If the Patent Office does not produce a *prima facie* case of unpatentability, then without more the applicants are entitled to grant of a patent. *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re Grabiak*, 769 F.2d 729, 733, 226 U.S.P.Q. 870, 873 (Fed. Cir. 1985).

Independent Claim 1 recites an address lookup structure that includes:

> a plurality of hash tables each storing prefixes for address lookups;
>
> a content addressable memory storing at least some prefixes for which a collision occurs within at least one of the hash tables; and
>
> a hashing lookup search mechanism that comprises:
>
> a routing table implemented with selective hashing for a plurality of prefixes with different lengths; and
>
> a plurality of memory blocks, wherein each hash table is allocated a group of the memory blocks based on a size of the

respective hash table and a pre-assigned maximum number of allocated blocks.

The Applicants respectfully submit that *Hariguchi*, *Douceur*, and *Frank*, taken alone or in combination, do not teach or suggest each and every element recited in Claim 1. In particular, it is submitted that *Frank* does not provide a disclosure that remedies the conceded deficiencies of *Hariguchi* and *Douceur*. Accordingly, without conceding the propriety of the asserted combination, the asserted combination is likewise deficient.

The Office Action concedes that *Hariguchi* does not teach "each hash table is allocated a group of the memory blocks based on a size of the respective hash table and a pre-assigned maximum number of allocated blocks." Nonetheless, the Office Action rejects Claim 1 contending that *Douceur* teaches "a hash table is allocated a group of memory blocks based on a size of the respective hash table" and that *Frank* teaches "allocating memory based on a pre-assigned maximum number of memory." (*Office Action*, page 3).

The Office Action asserts that *Frank* (col. 5, lines 31-34) teaches "allocating memory based on a pre-assigned maximum number of memory." However, *Frank* only discloses that the memory has a maximum size and, as such, processes also are limited to a maximum size. The cited portion of *Franks* only teaches that the process already has a maximum value. *Frank* contains no teaching or suggestion that groups of memory blocks are allocated based on a pre-assigned maximum number of allocated blocks. Therefore, *Franks* cannot reasonably be interpreted as teaching or suggesting "wherein each hash table is allocated a group of the memory blocks based on ... a pre-assigned maximum number of allocated blocks."

Accordingly, the Applicants respectfully request that the § 103 rejection with respect to Claim 1, and its dependent claims, be withdrawn.

Claims 10 and 14 recite features analogous to those recited in Claim 1. As such, these claims are allowable for the same or similar reasons as Claim 1.

Accordingly, the Applicants respectfully request that the § 103 rejection with respect to Claims 1, 10 and 14, and their dependent claims, be withdrawn.

CONCLUSION

As a result of the foregoing, the Applicants assert that the remaining Claims in the Application are in condition for allowance, and respectfully request an early allowance of such Claims.

If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at ***wmunck@munckcarter.com***.

The Commissioner is hereby authorized to charge any additional fees (including any extension of time fees) connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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